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July 7, 2003

Docket Management System  
U.S. Department of Transportation  
Room PL 401  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: *Comment in Support of Proposed Rule Making, "Area Navigation (RNAV) and Miscellaneous Amendments", with Recommended Changes*

Dear Sir or Madam:

In response to solicitation for comments on Docket Number FAA-2002-14002 regarding the Notice of Proposed Rulemaking (NPRM) on "*Area Navigation (RNAV) and Miscellaneous Amendments*", the Helicopter Association International (HAI) welcomes this opportunity to comment. HAI is the professional trade association for the civil helicopter industry. Our 1,500-plus member organizations and 1,400-plus individual members, in more than 70 countries, safely operate more than 5,000 helicopters approximately 2 million hours each year. HAI is dedicated to the promotion of the helicopter as a safe, effective method of commerce and to the advancement of the civil helicopter industry.

The following comments are submitted:

1) Under paragraph III. Section-By-Section Discussion of the Proposed Changes, Section 1.1 General Definitions:

"Category I (CAT I) operation: The term ``Category I operation" commonly has been used in the aviation industry and in the preambles of FAA regulatory documents for years, but it has never been defined in the CFR. The FAA is therefore proposing to add a definition of this term. The proposed definition of ``Category I (CAT I) operation" is "a precision approach with a decision altitude that is not lower than 200 feet (60 meters) above the threshold and with either a visibility of not less than one half statute mile (800 meters) or a runway visual range (RVR) of not less than 1,800 feet (550 meters)."

This definition should be changed to read:

"Category I (CAT I) operation: The term ``Category I operation" commonly has been used in the aviation industry and in the preambles of FAA regulatory documents for years, but it has never been defined in the CFR. The FAA is therefore proposing to add a definition of this term. The

proposed definition of "Category I (CAT I) operation" is "a precision approach with a decision altitude that is not lower than 200 feet (60 meters) above the threshold **for airplanes, and not lower than 100 feet for helicopters**, and with either a visibility of not less than one half statute mile (800 meters) or a runway visual range (RVR) of not less than 1,800 feet (550 meters) **for airplanes, and not less than one quarter statute mile or a runway visual range (RVR) of not less than 1,200 feet for helicopters.**"

2) Under Section 97.3 Symbols and Terms Used in Procedures:

As currently proposed, "This proposal would also add the term "helipoint," which is normally the center point of the touchdown and lift-off area (TLOF). It is usually a designated arrival and departure point located in the center of an obstacle-free area, 150-foot square, overlying an approved landing area, where the approach may be terminated in a hover or touchdown. The helipad of intended landing may not be located at the helipoint, however."

This wording is troublesome in that many heliports do not have a 150-foot square "obstacle free area" that complies with this change. Instead, this wording should be changed to "heliport reference point", with an accompanying definition, as worded:

"This proposal would also add the term **"heliport reference point (HRP)," which is the geographic position of the heliport expressed as the latitude and longitude at: (1) The center of the FATO, or the centroid of multiple FATO's for heliports having visual and nonprecision instrument approach procedures; or (2) The center of the Final Approach Reference Area (FARA) when the heliport has a precision instrument approach procedure.**"

This change is word for word from the latest draft version of the Advisory Circular AC 150/5390-2B *Heliport Design*.

3) Under Section 97.3 Symbols and Terms Used in Procedures (continued):

Additional changes that are included in AC 150/5390-2B should also be included to conform in this proposed rulemaking:

Recommended Change 1, add:

"This proposal would also add the term "Final Approach and Takeoff Area (FATO)," which is defined as an area over which the final phase of the approach to a hover, or a landing, is completed and from which the takeoff is initiated."

Recommended Change 2, add:

"This proposal would also add the term "Final Approach Reference Area (FARA)", which is defined as an obstacle-free area with its center aligned on the final approach course. It is located at the end of a precision instrument FATO."

Recommended Change 3, add:

"This proposal would also add the term "Helipoint", which is defined as the aiming point for the final approach course. It is normally the center point of the TLOF."

Recommended Change 4, add:

"This proposal would also add the term "Heliport", which is defined as the area of land, water, or structure used or intended to be used for the landing and takeoff of helicopters, together with appurtenant buildings and facilities."

Recommended Change 5, add:

"This proposal would also add the term "Touchdown and Liftoff Area (TLOF)", which is defined as a load bearing, generally paved area, normally centered in the FATO, on which the helicopter lands or takes off."

HAI urges adoption of these recommended changes that take into account the capabilities of helicopters and better define the parameters of helicopter operations.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy Resavage". The signature is fluid and cursive, with the first name "Roy" and last name "Resavage" clearly distinguishable.

Roy Resavage,  
President